



Winston H. Hickox
*Secretary for
Environmental
Protection*

Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013



Gray Davis
Governor



United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105-3901

2030741

April 25, 2002

Robert Walter
TRW Inc.
1900 Richmond Road
Cleveland, OH 44124

SAN GABRIEL VALLEY CLEANUP PROGRAM: REQUIREMENT FOR A TECHNICAL REPORT ON EMERGENT CHEMICALS SAMPLING, PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 FORMER AND ACTIVE PUENTE VALLEY OPERABLE UNIT SITES, 200 S. Turnbull Canyon Road, City of Industry, CA 91746 and 18301 East Arenth Ave., City of Industry, CA 91748 (FILE NO. 102.0007 and 105.0181)

Dear Mr. Walter:

The California Regional Water Quality Control Board, Los Angeles Region, ("Regional Board") is the public agency with primary responsibility to protect groundwater and surface water quality within the Los Angeles Region. The United States Environmental Protection Agency ("USEPA") is overseeing and directing the regional groundwater clean up activities in the San Gabriel Valley. This Regional Board and the USEPA (herein after the Agencies), conducted an initial investigation at your site and many others in the San Gabriel Basin in an effort to identify the source(s) of volatile organic compounds (VOCs) in soil and groundwater. After assessments and remediation were completed, site closure recommendations may have been granted in the form of a Regional Board "No Further Requirements" letter.

The detection of emergent chemicals {ammonium perchlorate, N-Nitrosodimethylamine (NDMA), 1,4-dioxane and hexavalent chromium} in groundwater, above State and Federal maximum contaminant levels (MCLs) or action levels (ALs) have recently caused the Agencies to reassess the threat posed to groundwater resources used for domestic supply. This recent development has caused the Agencies to have serious concerns about the presence of these emergent chemicals in the groundwater, the potential additional costs of remediation and their affects on human health and the environment. In addition, the Agencies are now in the process of reassessing cleanup remedies throughout the San Gabriel Basin. Some emergent chemicals such as NDMA are found at very low concentrations, but have acute to chronic health effects in humans. Some of these emergent chemicals are suspected carcinogens.

California Environmental Protection Agency

*****The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption***
For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>**

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Recent monitoring information has detected the presence of emergent chemicals in the groundwater within the Puente Valley Operable Unit (PVOU) Area. As a result, we are currently investigating potential sources of emergent chemicals within the PVOU. Therefore, pursuant to section 13276 of the California Water Code (CWC) and Section 104(e) of the Federal Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), you are hereby directed to test for the presence of emergent chemicals in your groundwater monitoring wells. To assist you, we are providing some guidance with respect to acceptable testing procedures for each of the specified emergent chemicals as follows:

<u>Emergent Chemical</u>	<u>Acceptable Test Method</u>	<u>Reporting Limit</u>
a) Ammonium perchlorate	USEPA Method 314	2 µg/L
b) N-Nitrosodimethylamine (NDMA)	USEPA Method 1625C	0.002 µg/L
c) 1,4-Dioxane	USEPA Method 8270C	2 µg/L
d) Total & Hexavalent Chromium	USEPA Method 7199/218.6	1 µg/L/0.3 µg/L

The use of these analytical testing procedures will provide consistency in the analysis of groundwater samples and provide the high quality data necessary to make many regulatory decisions. You can obtain a copy of the testing procedures by downloading the relevant document from the USEPA website listed below:

<http://www.epa.gov/epaoswer/hazwaste/test/sw846.htm>

If you do not have access to the internet, you can also obtain printed copies of the document by contacting the US Government Printing Office at (202) 512-1800 or the National Technical Information Service at (800) 553-6874.

To better coordinate the information gathering process, we would like to have your groundwater monitoring wells gauged and sampled within a two-week period, starting on **May 29, 2002** and ending **June 14, 2002**. This will allow the agencies to coordinate oversight activities and to ensure a staff representative be present. Please provide a least three days prior notice before commencing field activities. Submission of groundwater monitoring analytical results in a technical report will be due to the Regional Board Office with a copy to Ms. Penny McDaniel for the PVOU at the USEPA by **July 15, 2002**.

After we receive and analyze the information acquired and determine the nature and extent of the potential problem, we may request an additional semi-annual groundwater monitoring sampling event six months thereafter to ascertain seasonal variability in groundwater elevation fluctuations and general flow directions. You, or your representatives, are welcome to the Regional Board Office to review existing emergent chemical data on file.

Under Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), USEPA has broad information gathering authority which allows USEPA to require persons to furnish information or documents

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relating (1) to the identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transporter to a vessel or facility; and (2) the nature and extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility. While USEPA seeks your cooperation in this investigation, compliance with this request is required by law. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law, and noncompliance with this request could result in USEPA seeking the imposition of penalties of up to \$27,500 per day of noncompliance.

Pursuant to Section 13268 of the CWC, failure to submit the required groundwater sampling reports on Emergent Chemicals by the due date may result in an administratively imposed civil liability fine being assessed by the Regional Board, in an amount up to one thousand dollars (\$1,000) for each day the report or document is not received.

If you have any questions, please contact Mr. Dixon Oriola at (213) 576-6755 or Ms. Penny McDaniel (USEPA) at (415) 972-3178.

Sincerely,



Dennis A. Dickerson
Executive Officer
California Regional Water Quality Control Board,
Los Angeles Region

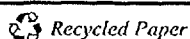


John Kemmerer
Chief, Site Cleanup Branch
Superfund Division,
USEPA, Region IX

cc: Mr. Michael Lauffer, Office of Chief Counsel, State Water Resources Control Board
Mr. Robert Sams, Office of Chief Counsel, State Water Resources Control Board
Dr. Jackie Spizman, California Department of Toxics Substances Control
Ms. Vera Melynk-Vecchio, California Department of Health Services
Ms. Carol Williams, Main San Gabriel Basin Watermaster
Ms. Grace Burgess, San Gabriel Basin Water Quality Authority

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